

# **EXHIBIT V**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

**DECLARATION OF BARBARA WILLIAMS**

I, BARBARA WILLIAMS, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks of the World Trade Center Towers occurred.

4. I worked for Bowles Corporate Services which provided security for Morgan Stanley located on the 44<sup>th</sup> floor of Tower 2, World Trade Center, New York, NY.

5. I was in Tower #2 of the World Trade Center, New York, New York at my office on the 44<sup>th</sup> floor when the planes hit the towers and I received physical injuries during the escape and collapse of the buildings. In the course of the attack and my escape, I witnessed the horror of

what can only be described as that of a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I suffered injuries to my feet and legs from running down 88 flights of steps to exit the building as well as stumbling and stepping on debris and glass in my stocking feet to try to exit the Tower. I had dress shoes on for work and had to abandon them in the confusion and rush to exit the building along with hundreds of others. I also was diagnosed with asthma, chronic rhinitis and esophageal reflux due to exposure to toxic substances since I was present and witnessed when both the Towers collapsed and was covered with soot and dust from the debris.

7. I sought medical attention for my injuries at an emergency room within 2 days following the attacks. After I made it back to my home in the Bronx on the day of the attacks, I could not leave my apartment due to the pain I was in and the shock of having seen the injuries of others, the collapse of the buildings and the confusion which occurred when the attacks were unleashed on us.

8. In approximately 2003, I was having difficulty breathing and I went for a yearly examination for individuals who had been present at the collapse of the Towers. I was diagnosed with asthma, chronic rhinitis and esophageal reflux due to and as a result of the crumpling and disintegration of the Towers. I was also diagnosed with back issues in January, 2002 due to the injuries I sustained the day of the attack.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I had been present and working at the World Trade Center during the 1993 bombing. The 2001 attack was far worse due to the confusion, the pandemonium and number of people who were impacted was so much greater.

11. Attached as Exhibit B to this Declaration are true and correct copies of my medical records related to the treatment I received following the September 11, 2001, terrorist attacks.

12. I previously pursued claims (VCF Claim Numbers #212-0005796 and #VCF0006261) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation. Attached as Exhibit C are copies of my eligibility decisions.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 4th day of January, 2020.

  
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Signature of Declarant Barbara Williams

# **Exhibits Filed Under Seal**